

# **EXHIBIT 13**

1 UNITED STATES DISTRICT COURT  
2 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
3 SAN FRANCISCO DIVISION  
Case No. 3:21-md-02981-JD  
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4 IN RE GOOGLE PLAY STORE  
5 ANTITRUST LITIGATION  
6 THIS DOCUMENT RELATES TO:  
Epic Games Inc. v. Google LLC, et al.,  
Case No: 3:20-cv-05671-JD

7  
8 In re Google Play Consumer  
Antitrust Litigation,  
Case No: 3:20-cv-05761-JD

9  
10 In re Google Play Developer  
Antitrust Litigation,  
Case No: 3:20-cv-05792-JD

11  
12 State of Utah, et al., v.  
Google LLC, et al.,  
Case No: 3:21-cv-05227-JD

13  
14 Match Group, LLC, et al.,  
v. Google LLC, et al.,  
Case No. 3:22-cv-02746-JD

15 -----x  
16 Tuesday, August 23, 2022  
17 9:16 a.m. PDT

18 \*\*HIGHLY CONFIDENTIAL  
19 UNDER PROTECTIVE ORDER\*\*  
20 - Volume I -

21 Remote Videotaped Deposition by  
22 Virtual Zoom of DONALD HARRISON, a  
23 Witness on behalf of Google, taken before  
24 Dawn Matera, a Certified Shorthand  
25 Reporter and Notary Public of the State  
of New York.

1 DONALD HARRISON - HIGHLY CONFIDENTIAL

2 and I am the videographer. The court  
3 reporter is Dawn Matera from the firm  
4 of Veritext Legal Solutions.

5 I am not authorized to  
6 administer an oath. I am not related  
7 to any party in this action nor am I  
8 financially interested in the outcome.

9 Please note that all appearances  
10 and affiliations will be noted on the  
11 stenographic record and will the court  
12 reporter please swear in the witness  
13 remotely.

14 D O N A L D H A R R I S O N, the  
15 Witness herein, having first been duly  
16 sworn by the Notary Public, was examined  
17 and testified as follows:

18 EXAMINATION BY

19 MR. SCHWARTZ:

20 Q. Good morning, Mr. Harrison. My  
21 name is Aaron Schwartz and I will be  
22 asking you questions today on behalf of  
23 the consumer class.

24 Can you please state your full  
25 name for the record, please.

1 DONALD HARRISON - HIGHLY CONFIDENTIAL  
2 on global partnerships, there is a period  
3 of time where another executive named  
4 Daniel Alegre managed the relationship  
5 with Apple, together with Joan Braddi. I  
6 wanted to say that lasted for a bit  
7 longer than a year and then I took over  
8 top partners and at that point started  
9 managing Apple.

10 Q. Okay. In terms of the  
11 financial impact on Google, the money  
12 flowing one way or the other, is Apple  
13 considered Google's largest partner?

14 A. In terms of the flow of funds,  
15 in terms of the value of the commercial  
16 relationship between the parties, Apple  
17 is our largest partner.

18 Q. And how long has Google  
19 considered Apple a partner?

20 A. I am sure we considered Apple a  
21 partner since whenever we did the first  
22 distribution deals that saw Search appear  
23 on Apple surfaces, which probably goes  
24 all the way back to 2006/2005. Possibly  
25 earlier. I am not aware.